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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

BRIDGER LEE JENSEN, SINGULARISM,
PSYCHE HEALING AND BRIDGING, LLC
dba PSYCHEDELIC THERAPY JOURNEY

Plaintiffs,

vs.

UTAH COUNTY, PROVO CITY, JEFFREY
GRAY, TROY BEEBE, BRIAN WOLKEN,
JACKSON JULIAN, JOHN DOES 1-4,

Defendants.

NOTICE OF REMOVAL

Civil No. 2:24-cv-00887-JNP

Judge Jill N. Parrish

(Removed from Fourth Judicial District
Court, Utah County, State of Utah,
Case No. 240406123)

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendants Utah County and Jeffrey Gray (collectively “Utah County”) and Provo City, Troy Beebe, Brian Wolken, and Jackson Julian (collectively “Provo”) (together “Defendants”) hereby give notice of removal of the action *Jensen v. Utah County*, Case No. 240406123, from the Fourth Judicial District Court, Utah County, State of Utah, to the United States District Court for the District of Utah. As grounds for removal, Defendants state as follows:

State Court Proceedings

1. Plaintiffs Bridger Lee Jensen, Singularism, and Psyche Healing and Bridging, LLC dba Psychedelic Therapy Journey (“Plaintiffs”) filed their Complaint on November 19, 2024. Consistent with 28 U.S.C § 1446(a), a copy of the underlying Complaint (“Complaint”) is attached hereto as Exhibit A.

2. Because the Complaint was filed fewer than 30 days ago, removal is timely. *See* 28 U.S.C. § 1446(b).

3. A copy of the state court docket is attached hereto as Exhibit B.

4. Removal to this District is proper because the United States District Court for the District of Utah embraces the place where the action is pending, i.e., the Fourth Judicial District Court in and for Utah County, Utah. *See* 28 U.S.C. § 1441(a).

Federal Question

5. Defendants base their removal on federal question jurisdiction pursuant to 28 U.S.C. §§ 1331, 1441(a), and 1446. The Complaint includes claims asserted pursuant to 42 U.S.C. § 1983, the First Amendment to the United States Constitution, and the Fourth Amendment to the United States Constitution.

6. The Court has jurisdiction over the remainder of the case because all the claims form part of the same case or controversy. *See* 28 U.S.C. § 1367.

Notice

7. Pursuant to 28 U.S.C. § 1446(d), Defendants will notify Plaintiffs and the Fourth Judicial District Court of the filing of this Notice of Removal by filing a copy of the same with the state court.

Dated this 27th Day of November, 2024

JAMES DODGE RUSSELL & STEPHENS, P.C.

/s/ Mitchell A. Stephens

Mitchell A. Stephens

Lara A. Swensen

Counsel for Utah County and Jeffrey Gray

PROVO CITY LEGAL

/s/ Rich Roberts

Rich Roberts

*Counsel for Provo City, Troy Beebe, Brian Wolken, and
Jackson Julian*

CERTIFICATE OF SERVICE

A copy of the foregoing was served upon the following via electronic mail:

tbean@fabianvancott.com

achristiansen@fabianvancott.com

gmillward@provo.gov

rroberts@provo.gov

DATED this 27th day of November, 2024.

JAMES DODGE RUSSELL & STEPHENS, P.C.

/s/ Mitchell A. Stephens

Mitchell A. Stephens

Lara A. Swensen

Counsel for Utah County and Jeffrey Gray